

EXHIBIT F

Matt H. Cline

From: Ben Gastel <beng@branstetterlaw.com>
Sent: Wednesday, March 19, 2014 4:56 PM
To: Matt H. Cline; Gerard Stranch
Cc: Chris J. Tardio; Alan Bean; Kristen Johnson Parker (kristenjp@hbsslaw.com); Chalos, Mark P. (mchalos@lchb.com) (mchalos@lchb.com)
Subject: RE: NECC MDL

Matt,

Thanks for your email. As an initial matter, as you are aware, for months the PSC has been trying to get discovery started in this case, and it believes that all parties should have access to NECC-related documents. To achieve that end, the PSC recommends that you join its motion to lift the discovery stay (Dkt. No. 534), which we believe is ripe for decision, in order to obtain discovery over NECC-related documents. We believe that procedural path would appropriately and directly raise the issue with the district court and we believe that is the proper way to achieve the result you desire. The method you propose is indirect, at best, and could potentially raise more problems than it solves. So, the PSC can't agree to your proposal as stated.

Thank You,

Ben Gastel
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From: Matt H. Cline [mailto:matt@gideoncooper.com]
Sent: Monday, March 17, 2014 9:54 AM
To: Gerard Stranch; Ben Gastel
Cc: Chris J. Tardio; Alan Bean
Subject: NECC MDL

Gerard and Ben,

As we have stated on several occasions, we think it is important that we have access to the NECC documents informally produced to the PSC and housed in the US Legal repository. We have requested these documents in writing from the PSC and the Trustee. Those requests were rejected. You have said the PSC has no real interest in keeping those documents from us but are bound by the terms of a confidentiality agreement with NECC.

We would like to get this issue in front of Judge Zobel at the next status conference. Will you agree that our letter to the PSC requesting access to the documents constituted a request for production that you objected to based on your agreement with the PSC, such that we can file a motion to compel?

Please feel free to call if you would like to discuss.

Thanks.

Matt

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